

2202 Keiffer Road
Shrewsbury, VT 05738
July 17, 2020

Vermont Enhanced 9-1-1 Board
100 Stare Street, Suite 500
Montpelier, VT 05620-6501

Dear Board Members,

I want to offer two brief comments that I think will improve the proposed outage reporting rule.

First, I reiterate a concern that I raised in comments I made on May 15. In Sec. 6.2 of the rule, please delete the words shown in brackets and insert the underlined words as shown below:

“~~[All]~~ For any exemption from disclosure a report submitter~~[s]~~ may request, the submitter shall ~~[mark information they believe to be exempt from public disclosure and]~~ fully identify the specific information that the submitter asks not be disclosed and provide an explanation of why ~~[for each]~~ the subsection of 1 V.S.A. Sec. 315-320 upon which they rely applies. Such ~~[marks]~~ requests may be considered but are not binding on the Board in responding to public requests.”

While carriers may desire near-complete or blanket non-disclosure, emergency managers and responders, local officials, and the public need transparency and access to outage information on a full and timely basis, and I hope you will ensure that the rule achieves this.

Second, I recognize that the use of Zip Codes as a basis for outage reporting accords with the California rule which the Board was mandated by the Legislature to follow. However, as you revise the proposed rule, I urge you to include a provision that requires the carriers to provide to the Board whatever information the Board determines is necessary to establish a protocol for calculating and verifying the number of a carrier's subscribers within all Zip Codes and wireless coverage areas. It is critical to make sure that California's reporting methodology is well-adapted to and workable in Vermont's particular conditions and especially in our more sparsely populated rural areas.

Thank you for your work and for your consideration of these comments.

Sincerely,

Jonathan Gibson